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AUTHOR Millard, Richard M.
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ABSTRACT

The roles of accrediting associations and college trustees in promoting the quality of educational operations are considered. Voluntary accrediting associations have established a framework for institutional and program self-regulation, including the concept of peer review, and have emphasized the evaluation of institutions and programs in the light of appropriate functions, objectives, goals, and results. Issues pertaining to the relationship of accrediting agencies to their institutional and program members areas follows: acceptance of responsibility for involvement in accreditation by the institution and program members, including the trustees; the need to increase understanding of the value and nature of accreditation with all members of the educational community, the public, and state and federal governments; the adequacy of accreditation standards; the relation of institutions to regional or institutional accreditation on the one hand and to specialized accreditation on the other; and the relationship between voluntary accreditation and the state and federal governments. It is suggested that the role of the trustees in the accreditation process can be critical: trustees should be involved in self-study preparation, in the review of reports of the accrediting visits, in consideration of recommendations in final reports, in the meetings and governance of the accrediting agencies, and in other aspects of the accreditation process. It is suggested that the self-regulatory process of accreditation is important and that state and federal governments should not be involved in accreditation of schools. (SW)

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ACCREDITATION, SELF-REGULATION, AND BOARD RESPONSIBILITY

The issue of quality in higher education has become everybody's business. There is a growing concern, whether justified or not, that academic quality is in jeopardy or in fact already has been diluted. This may be part of a general crisis in credibility of many social institutions including government. It may in fact be more severe in relation to some other institutions than it is in relation to higher education. However, as it relates to higher education it has resulted from the convergence of a series of factors which have tended to bring into question not only the quality but also the integrity of higher educational institutions and programs.

The period of student unrest of the late 1960's and early 70's shook public confidence far more than is sometimes now recognized. Regardless of the real causes, students seemed to be questioning both the relevance and the quality of their education.

With the tremendous increase of federal student aid funds in the 1970's there were enough cases of mismanagement, even fraud, although limited to a small percentage of institutions, to arouse public and governmental concerns. Scholastic aptitude scores, for whatever reasons, have declined. Elementary and secondary schools have been under attack for some time. Many, perhaps most, colleges have had to institute remedial education. It is not surprising that the concern with quality on the part of the public has shifted today to include higher as well as elementary and secondary education.

The 70's saw an extension of concern with consumer protection beyond business and industry to higher education. As student consumer awareness spread, it became obvious that at least some practices of legitimate institutions were open to question.

Finally, the rapid expansion of the 60's and 70's produced growing pains. Small colleges, particularly in the public sector, not only expanded but became universities, added faculty, facilities, and advanced degrees. Not all of these were as carefully planned and developed as they might have been with the result that quality was sometimes compromised for what was perceived to be immediate need.

Today we are faced with a very different set of conditions than those of the 60's and 70's. We are moving into a period of variable enrollments in which major decreases in enrollment for many institutions may occur in a number of parts of the country. Some institutions concerned with survival may be tempted to seek bodies by lowering standards and opening programs for which they are not prepared.

The fiscal situation for much of postsecondary education appears less than bright. The probability of continually decreasing federal support is high.

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Economic conditions in a series of states from Oregon to Connecticut have induced fiscal stringencies at state levels where income receipts have fallen far behind income projections. Tax payer resistance continues in most sections of the country. Federal cut-backs in other areas will further stretch already tight state budgets.

Enrollment and fiscal situations will place new pressures on higher education institutions and make the effort to preserve and enhance quality just that much more difficult. At the same time demands for accountability, particulary on the part of state governments, continue to increase.

That both the academic and the general communities including state government, have become progressively concerned with the issue of quality in higher education is clear. In 1978 the American Assembly devoted a major conference to the issue of institutional integrity. The Carnegie Council on Policy Studies in 1979 published its report, Fair Practices in Higher Education.[1] The 1979 meeting of the American Council on Education was focused on the issue of quality. Papers from that meeting recently have been published under the title Quality - Higher Education's Principal Challenge.[2] In the foreword, Jack Peltason comments, "In the higher education community, our most precious asset is public confidence. If we are to keep that confidence, we must maintain quality in the academic and other missions which the public has entrusted to our enterprise. If we fail to do so, the public will, rightfully, withhold its support."[3] A Task Force of the Southern Regional Education Board produced a report in June of 1981 entitled The Need for Quality[4] calling into question traditional means of quality assessment and control. A joint meeting of the Council of Chief State School Officers and the State Higher Education Executive Officers in August of this year was devoted to the subject "Quality Education: A Common Agenda." The American Council on Education has, as of July of this year, launched a National Commission on Higher Education Issues chaired by Robert Fleming with representatives of higher education, business, labor, and government in which "maintaining the quality of higher education... heads the Commission's list of concerns," according to its Chairman.[5]

What has all of this to do with accreditation, self-regulation, and Board responsibility? I would suggest that it is at the heart of the matter. What is at issue is whether academic institutions individually and the academic community collectively through its voluntary, self-regulatory, accrediting associations can effectively assess, enhance, and assure the quality of educational operations to a degree commensurate with insuring public confidence, or whether control and assessment will pass to others.

[1]Fair Practices in Higher Education, San Francisco: Jossey-Bass Publishers, 1979.

[2]Quality-Higher Education's Principal Challenge, Washington: American Council on Education, 1981.

[3]Ibid, ix.

[4]The Need for Quality, Atlanta, Georgia, 1981.

[5]Higher Education and National Affairs, volume 30, number 24, Washington, D.C.: American Council on Education, 1981, p. 3.

The primary responsibility for quality control and enhancement obviously rests with institutions and programs. As the governing bodies of institutions, the ultimate legal responsibility for the integrity of the institution rests with you as trustees. You hire a president and his staff to carry out the institution's instructional, research, and public service functions, and you determine institutional direction, integrity, and effectiveness in fulfilling its mission. The quality of instruction and research rests with the faculty, but the quality of the faculty, in fact the quality the institution and its programs as a whole depends on your support, policy decisions, and evaluation. If an institution is in trouble, if its quality is questionable, it may be the president who is fired or reinforced, but the trustees do the firing or the reinforcing and set the general policy framework under which the institution must operate. In this sense you are the institution's primary self-regulatory body in relation to quality control and improvement.

But where and how does accreditation fit into the picture and how does it involve you? Accreditation is a creation of the academic and professional communities. Accrediting agencies are voluntary associations of institutions and programs involved as a community in self-regulation for the assessment and enhancement of quality. They are the academic community's primary means of assuring the public that their member institutions and programs are operating in the public interest, are keeping their houses in order, and are committed not only to the preservation but to the enhancement of quality. Accrediting associations are the institutions, programs, and professionals who are their members. In this sense they are not "They" - external bodies designed to harrass institutions and programs through periodic visits and judgements - but "We" - the institutions, programs, and professionals concerned with the integrity and quality of the academic enterprise and providing assurances of this integrity and quality to each other, to students, to the public, and to various levels of government. Accrediting associations operate through a system of institutional and program self-study, assessment and peer review according to standards based on institutional and/or program purpose and agreed upon by the appropriate academic community.

Accreditation is a uniquely American phenomenon. In most countries the establishment and maintenance of educational standards and quality control is a governmental function of a centralized ministry of education. Here we are fortunate to have essentially a non-governmental, voluntary, self-regulatory approach to quality assessment and enhancement that uniquely reflects the divergent, semi-autonomous character of American higher education.

Higher education during much of the first three centuries of its existence in the United States developed not really by plan but as a result of the felt need on the part of churches, professional groups, and the states themselves, first for educating clergy and lawyers, then for teachers, and then, with some nudging from the federal government, for educating farmers, mechanics, and citizens in general.

By the end of the 19th century higher education represented a disparate composite of institutions. The impact of German higher education had spurred the development of graduate schools. The leading institutions encountered a series of related problems; one was admission from secondary schools which varied considerably among themselves in character and quality; a second was the

increasing problem of transfer from institution to institution, particularly from those "colleges" running their own preparatory programs where preparatory and college programs were not well distinguished; and third was admission to graduate work from the variety of undergraduate schools across the country. As a result of these problems, in the latter part of the 19th century, the institutions in various sections of the country formed associations to increase articulation with secondary schools, to deal with problems of transfer and cooperation, and to develop lists of appropriate schools from which to admit graduate students. It was out of these membership organizations that the regional accrediting associations developed.

At about the same time or even earlier, associations developed in specific academic disciplines and professional areas concerned with quality of education in those areas; for instance, the American Medical Association dates back to 1847. Out of these associations grew the specialized accrediting agencies whose concerns have been to define the parameters of professional and occupational fields, to determine the types and quality of education appropriate to those fields and to protect the public against inadequately educated practitioners.

On the whole the voluntary accrediting associations have served the academic community and public well. Historically they have acted as the guardians of quality and of quality improvement. They have provided the framework for institutional and program self-regulation and self-improvement in the higher education community. They have established the concept of peer review as essential to effective quality review. They have led the evolution from rigid quantitative input factors in quality assessment to the evaluation of institutions and programs in the light of appropriate functions, objectives, goals, and results. With all this, they have provided and encouraged a reasonable flexibility for experimentation and innovation, and this in contrast to the potential rigidity of regulatory governmental approaches. The specialized agencies, in addition, have helped define professional responsibility for quality within fields and effective education for contribution to those fields.

Today the goals of accreditation as summarized by the Council on Postsecondary Accreditation include the following:

* Foster excellence in postsecondary education through the development of criteria and guidelines for assessing educational effectiveness.

* Encourage improvement through continous self-study and planning.

* Assure the educational community, the general public, and other agencies and organizations that an institution or program has clearly defined and appropriate objectives, maintains conditions under which their achievement can reasonably be expected, appears in fact to be accomplishing them substantially, and can be expected to continue to do so.

* Provide counsel and assistance to established and developing institutions; and

* Endeavor to protect institutions against encroachments which might jeopardize their educational effectiveness or academic freedom.

Granted their historical importance, their laudatory goals and the fact that accreditation is not only the product of academic concern but the academic

community's primary self-regulatory means of quality assessment and enhancement, why then is quality today such a major issue of concern and why are both institutions and accrediting agencies under attack? Further, why should trustees be concerned, and how can they become more involved? We already have indicated some of the reasons why the issue of quality has become critical. If the accrediting community is primarily responsible for assurance of quality and there is real question about the preservation and enhancement of quality, then it is easy to come to the conclusion that accreditation has not or is not appropriately or effectively performing its function. To be sure, many of the factors that have given new prominence to the quality issue involve general social conditions and demographic and fiscal changes that are neither under the control of institutions and programs nor of accrediting associations. Nevertheless to the extent that new conditions pose new quality issues, both institutions and programs and accrediting agencies must be prepared to deal with them.

It is not unusual for accreditation and the accrediting community to be under attack. Since the functions accrediting associations perform are vital to the health of postsecondary education, they are under constant scrutiny and are particularly vulnerable to "worst case" arguments. The fact that since 1952 the Federal government has utilized accreditation as one critical part of eligibility for federal funds has increased its vulnerability because of the impact of loss of accreditation on institutions on the one hand and public and governmental reactions when a few accredited institutions violate public trust on the other.

Criticisms of accreditation have ranged from the charge that because accrediting agencies are membership organizations of institutions or programs, they are by the nature of the case self serving, to the charge that because accreditation reports are confidential and can be released only by the presidents of institutions they are of little value to anyone but the institutions and the results are too often used selectively by institutions for political ends.

Internally, the same kinds of charges frequently are leveled at specialized accrediting agencies in relation to the institution as a whole. That there have been instances in which some of these charges are relevant hardly can be denied. The solution, however, is not to abandon the accrediting process but to strengthen it through public as well as institutional and program representation on accrediting commissions and visiting teams, through stressing the importance of peer review to quality assessment, through reconsideration of what should and should not be kept confidential, and through encouraging more extensive interagency cooperation in the accrediting process.

Progress has been made in a number of these areas. All accrediting agencies recognized by the Council on Postsecondary Accreditation, for example, now have public members on their commissions and the confidentiality issue is under reconsideration. More progress is necessary, but the accrediting associations can move only as rapidly as their member institutions and programs are willing to move. You and your institution can play a critically important role as members of the accrediting associations and of the accrediting community.

There are, however, a series of issues that in some respects are more fundamental and that involve the relationship of accrediting agencies to their

institutional and program members. The first of these involves acceptance of responsibility for involvement in accreditation by the institution and program members themselves, including the trustees. Accreditation can be only as strong and effective as the institutions and programs are willing to make it. This involves active participation in the accrediting process not just by presidents and committees, but by the trustees, faculties, students, and the educational institutions.

Accreditation self-study should not be an exercise grudgingly entered into to meet what appear to be external accreditation requirements, but an integral part of the ongoing self-improvement of the institution itself. The visiting team should not be considered simply a group of external examiners, but a peer group addressing with the institution the issues of institutional improvement.

The matter of institutional responsibility and involvement also extends to willingness and encouragement of faculty, administrators, and trustees to become involved in accreditation visits to other institutions. Accreditation is sometimes criticized on the grounds that the leading institutions are not there - that the process is carried out by less than the leaders in the field. While there are ample instances to show that this is not generally the case, the few instances in which such responsibility is not accepted, to that extent, weaken the credibility of the process. Finally, institutions and programs have responsibilities as members of accrediting associations to become involved in the affairs of the associations themselves. They are your associations and if they are to fulfill their responsibilities it is crucial that you, either directly or indirectly, be involved in their governance, their policy development, and their practices.

Here the role of the trustees can be critical. Are you informed when accreditation visits are imminent? Are you involved in the self-study preparation? Do you review the reports of the accrediting visits and the final reports to the commissions? Do you give careful consideration to recommendations in such final reports? Do you encourage your administration and faculties to participate in visiting teams? Do you receive and react to proposed changes of standards or policies of the accrediting associations? Does your institution or do you participate in your accrediting association's meetings and governance?

The Council on Postsecondary Accreditation which, for the academic and accrediting community, recognizes accrediting agencies and coordinates their activities, currently is considering recommendations on governance that would provide more effective balance among institutions, accrediting associations and the general public. If these recommendations are adopted it will be even more important for trustees as well as presidents and faculties to become active through the Council in insuring that accreditation is capable of meeting the challenges ahead.

A second critical issue involves the importance of increasing understanding of the value, the nature and function of accreditation first not only within institutions and their faculties, students, administrators, and trustees, but also with the general public including state and federal governments. Far too frequently the campus community, including trustees, have very little concept of what accreditation is and does, how it operates, or why particularly today it is critically important. It is not a day to day policing action. It is not as some faculties seem to think an external means of raising salaries or creating

pressure for new facilities and equipment. It is not as some students seem to think a vehicle for complaint resolution. It should not be an instrument as some administrators believe it to be for beating either trusteess or legislators over the head. Principally it is a means of attesting to and encouraging the enhancement of institutional and program integrity and quality. Today this is critically important. This is the message that together we must get across. Further we need to insure that this in fact takes place. The alternatives to voluntary accreditation could be disastrous to the academic community and the country.

A third closely related issue involves accreditation standards. One of the recurring criticisms of accreditation is that its standards are too soft and subjective and concentrate on input factors rather than results, and that this is because judgement is based on institutional and program objectives rather than quality per se. I happen to believe that this is a misplaced criticism based on the false assumption that quality is an ineffable single thing with a series of absolute quantitative conditions that apply regardless of program or educational objectives. Such a concept of quality and quality judgement is a dead-end that does not take into account the diversity of American postsecondary education and the variety of educational needs that it is designed to serve. To the contrary, it seems to me that the only objective way either to define or assess quality is in terms of effective fulfillment of appropriate educational objectives. The accrediting associations have learned this the hard way through a process of evolution from fixed quantitative requirements to assessment in the light of objectives. But somehow we have not been able to get this message or the meaning of accreditation across to parts of the public including some people in the academic community itself. What is essential if we are to do so and improve the process is that we continue to review, evaluate, modify and strengthen accrediting criteria and standards with increasing emphasis on the results as well as the processes.of education. Progress has been made in this direction but more is necessary.

A fourth issue involves the relation of institutions to regional or institutional accreditation on the one hand and to specialized accreditation on the other. As you are well aware there are nine regional institutional accrediting associations and four national institutional accrediting associations. The four national institutional accrediting associations accredit primarily single purpose institutions - business colleges (The Association of Independent Colleges and Schools), private occupational and technical schools (National Association of Trade and Technical Schools), correspondence schools (The National Home Study Council), and Bible colleges (American Association of Bible Colleges). There is even something of a problem in relation to the national institutional agencies. Some institutions seem to assume that unless an institution is accredited by a regional accrediting association it either is not accredited or has an inferior type of accreditation. This clearly is not the case. The national institutional accrediting agencies undergo the same careful scrutiny by the Council on Postsecondary Accreditation as do the regionals and in the areas of their concern apply comparable and equally rigorous standards. Credits earned at institutions accredited by these agencies if applicable to particular programs should be given equal consideration with those from regionally accredited schools as a matter of institutional policy.

Specialized accrediting associations are far more varied. They primarily accredit programs or schools in complex institutions that prepare professionals,

technicians, or members of special occupations. They vary from large and prestigious associations such as the Liaison Committee on Medical Education and the Accreditation Board for Engineering and Technology to relatively small associations like the American Podiatry Association and the Foundation for Interior Design Education and Research. The Council on Postsecondary Accreditation currently recognizes thirty-eight specialized accrediting associations. Most of these associations require that the specialized programs or schools that they accredit be part of an institutionally accredited institution. Most of these associations include both educators and professionals in their fields. As already noted, they play an extremely important role in helping to define the professions, in insuring that education in those fields is adequate to meet educational, professional objectives, and in protecting the public against ill-trained or ill-educated professionals. Ideally they not only assess the quality of professional work offered but advise the institution in ways to improve professional education. Thus, in theory, they complement the work of the institutional accrediting agency by assessing particular fields in greater depth.

A problem arises because of their number. While most institutions are institutionally accredited and may have one or two special accredited programs, large complex institutions may be visited by as many as twenty-seven different specialized agencies. When in such cases specialized agencies operate on different schedules requiring separate self-studies and visitations, this can lead to duplication and considerably increased expense. Although the tendency toward increased specialization is a mark of contemporary society, institutions are rightly concerned about proliferation of agencies and problems of duplication and cost. Without turning back the clock, probably it is not feasible to try to reduce the number of specialized agencies and it might not be in the public interest to do so. However, this tendency can be counter-balanced by more effective interagency cooperation - that is through joint or cluster accreditation preparation and visits among specialized agencies and of the specialized agencies with institutional agencies. Many of the agencies are aware of the problem and are actively working in this direction. The Council on Postsecondary Accreditation has issued a policy statement on interagency cooperation. But here the institutions and the boards can help as well by requesting such joint visits and by working out with the appropriate agencies complementary time schedules. A request for joint visits, in fact, must come from the institutions. This is another area in which trustee or institutional policy can make a difference.

A fifth issue involves the relationship between voluntary accreditation and the institutions and programs it represents and the state and federal governments. It should be pointed out that the atmosphere in Washington has changed considerably and the possibility of cooperation between the accrediting community including the Council on Postsecondary Accreditation and the Department of Education appears to be far more possible than it has for some time in the past. We still need to develop a clearer definition of the federal role and this is beginning to take shape. However, a far more effective dialogue with the states and with state agencies than has taken place in the past must have a high priority. The states have legitimate interest and a necessary function to play in authorizing institutions to operate and grant degrees; one that has been supported by the academic and accrediting communities. After all, an institution must exist before it can become a candidate for accreditation. Some of the basic consumer protection issues can best be handled at the state

authorization level. However, state concern with quality improvement and accountability is very real and will increase. I do not believe that either the states or the federal government should get involved in accreditation for the end result inevitably is increased regulation and rigidity and the loss of the self-regulatory characteristics of higher education through accreditation. But if they are not to do so then it is critically important that the accrediting community and the states both understand each other and work together to reinforce quality assurance and improvement. Again it is crucial that institutions and their boards reinforce the accrediting community in these discussions.

We are at a crossroads in relation to the issue of higher education quality, quality assessment, and quality enhancement. We started by pointing out that quality has become everybody's business. In a sense this is good for it does mean that the level of awareness and concern with quality issues has become as central as it should be. The critical question is where the responsibility for quality is to reside. Will it remain within the academic community and its self-regulatory accrediting associations or will it be taken over by others through default, indifference, or by design? I believe that we have a relatively short time in which to answer the question. With whatever its weaknesses, no more effective system for quality evaluation and enhancement of vital, dynamic educational institutions has been devised than the voluntary self-study, peer review, results and objectives oriented process that characterizes accreditation. But it will not work, or at least will be so diminished in its effectiveness that other agencies will move in without institutional acceptance of responsibility and commitment. I can think of few issues more important for trustees to consider and become involved in than this.

Obviously quality control and enhancement begins with and must end in self-regulation at home in each institution. Here trustee responsibility is clear. Nobody not in the institution can create institutional integrity. But through the academic community's self-regulatory mechanism of accreditation, institutional efforts can be reinforced and, equally, if not more important, other institutions, students, and the public can be assured that institutions and programs are fulfilling their academic objectives, are maintaining quality, and are working to enhance it. The accrediting process must continue to evolve and improve, but it needs your understanding, reinforcement and support to do so. Accreditation is not the particular province or prerogative of presidents, faculty, or students but is the business of the institution as a whole and its publics. From this point of view the trustees have a major responsibility to see that it works.

The stakes are incredibly high. On whether or not institutions and programs in the academic community through their self-regulatory accrediting associations are able to meet the challenge of quality control, assessment and enhancement may well depend the health and freedom of higher education in this country for a long time to come.